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April 5, 2018

**VIA ELECTRONIC FILING**

Hon. Andrew T. Baxter  
U.S. Magistrate Judge  
United States District Court  
Northern District of New York  
Federal Building and U.S. Courthouse  
P.O. Box 7396  
Syracuse, NY 13261-7396

Re: *CAR-FRESHNER Corp., et al. v. American Covers, LLC, et al.*  
5:17-cv-171 (TJM/ATB)

Dear Magistrate Judge Baxter:

We write on behalf of Plaintiffs CAR-FRESHNER Corporation and Julius Sämann, Ltd. ("Plaintiffs"). In connection with Plaintiffs' response to Defendants' letter motion to compel, dated March 19, 2018 (Docket No. 58), and in accordance with Paragraph 10 of the Parties' Protective Order (Docket No. 39) and N.D.N.Y. L.R. 83.13, Plaintiffs seek to file under seal certain materials designated by Plaintiffs and Defendants as "Confidential – Attorneys' Eyes Only."

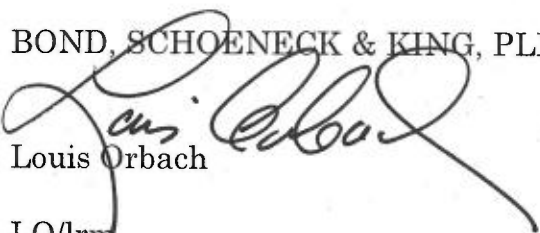
Plaintiffs' response to Defendants' letter motion to compel discusses deposition testimony by party witnesses that has been designated as "Confidential – Attorneys' Eyes Only," and attaches portions of that testimony as exhibits. Accordingly, Plaintiffs seek to seal: (1) portions of their response to Defendants' letter motion to compel; and (2) Exhibits A and B to the response, in their entirety.

Plaintiffs are filing a redacted version of these materials contemporaneously with this letter, and will send an unredacted version of the same to chambers and Defendants' counsel via email. A proposed order permitting Plaintiffs to file the unredacted version under seal is attached hereto.

Hon. Andrew T. Baxter  
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Respectfully submitted,

BOND, SCHOENECK & KING, PLLC

  
Louis Orbach

LO/lrm  
Enclosures

cc: All Counsel (via ECF)

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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CAR-FRESHNER CORPORATION and JULIUS  
SÄMANN LTD.,

Plaintiffs,

Civil Action No.:  
5:17-cv-171 (TJM/ATB)

v.

AMERICAN COVERS, LLC f/k/a AMERICAN  
COVERS, INC. d/b/a HANDSTANDS, ENERGIZER  
HOLDINGS, INC., and ENERGIZER BRANDS, LLC,

Defendants.

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**[PROPOSED] ORDER GRANTING DEFENDANTS' LETTER MOTION TO SEAL**

This matter comes before the Court on the April 5, 2018 Letter Motion to Seal (the "Motion") filed by Plaintiffs CAR-FRESHNER Corporation and Julius Sämann, Ltd. ("Plaintiffs").

IT IS HEREBY DIRECTED THAT, for good cause shown, Plaintiffs' Motion is GRANTED. The Clerk of the Court is DIRECTED to seal: (1) portions of Plaintiffs' April 5, 2018 response to Defendants' letter motion to compel (the "Response"); and (2) Exhibits A and B to the Response.

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Hon. Andrew T. Baxter  
U.S. Magistrate Judge  
United States District Court  
Northern District of New York

**CERTIFICATE OF SERVICE**

I certify that on the 5th day of April, 2018 a true and correct copy of Plaintiffs' Letter Request was served upon the following counsel via ECF as follows:

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*Counsel for Defendants*

s/ Louis Orbach  
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